

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Edward C. Tomaszewski,

Debtor.

Case No. 24-12260-AMC
Chapter 13

Motion to Extend the Automatic Stay

Debtor, through his attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on July 1, 2024. He has not yet filed a plan and all schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007(b), but will do so in a timely manner.
2. The Debtor was involved in one active bankruptcy between July 2, 2023, and July 1, 2024:

Case No.	District	Filed	Dismissed	Reason
23-13357	PAEB	11/06/2023	12/29/2023	Failure to file documents

3. Because the Debtor was involved in only one active bankruptcy between July 2, 2023, and July 1, 2024, the automatic stay is set to expire on July 31, 2024. 11 U.S.C. § 362(c)(3)(A).

4. The Court may extend the automatic stay when a case is filed in good faith as to the creditors to be stayed. Good faith means that there are new circumstances demonstrating that the Debtor can probably reach the end of a chapter 13 plan. *In re Legree*, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).

5. This case was filed in good faith. The debtor recently sold one of his properties and can draw on the sales proceeds to make his plan payments in the instant case.

6. Because this case was filed in good faith, the Court must continue the automatic stay against all creditors until the Debtor receives a discharge.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: July 1, 2024

CIBIK LAW, P.C.
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